

## REMARKS

### I. INTRODUCTION

In response to the Final Office Action dated July 12, 2005, and Advisory Action dated October 5, 2005, claims 1-2, 4-8, 10-14, and 16-21 have been amended. Claims 1-21 remain in the application. Entry of these amendments, and re-consideration of the application, as amended, is requested.

### II. PRIOR ART REJECTIONS

In paragraph (1) of the Office Action, claims 1-3, 7-9, 13-15, and 19-21 were rejected under 35 U.S.C. §102(b) as being anticipated by Hollingsworth et al., U.S. Patent No. 5,444,836 (Hollingsworth). In paragraph (2) of the Office Action, claims 4, 10, and 16 were rejected under 35 U.S.C. §103(a) as being unpatentable over Hollingsworth in view of Matsushita et al., U.S. Patent No. 6,049,340 (Matsushita). In paragraph (3) of the Office Action, claims 5, 6, 11, 12, 17, and 18 were rejected under 35 U.S.C. §103(a) as being unpatentable over Hollingsworth in view of Felser et al., U.S. Patent No. 6,025,849 (Felser).

Applicants respectfully traverse these rejections.

Specifically, the independent claims were rejected as follows:

In regards to claims 1, 7, 13, 19 – 21 –

Hollingsworth et al. Discloses an apparatus and method for creating and applying flexible, user defined rules for placement of graphical objects in a computer aided drafting (CAD) application. The placement subsystem (100) and its relationship to other subsystems are shown in Fig. 1. Placement subsystem (100) communicates with database subsystem (102) over bidirectional communication link (110) to retrieve information and attributes associated with graphical objects to be placed on a graphical image. Database subsystem (102) may represent any database means capable of storing and retrieving information (claim 13, 21: storage medium readable by computer). Placement subsystem (100) manipulates the information retrieved from database subsystem (102) by applying user-defined rules to determine the proper placement of the graphical objects on the graphical image (claims 1.c.i., 1.c.ii, 7.b.iii.1., 7.b.iii.2, 13.c.i., 13.c.ii., 19-21) [column 4, lines 64-66]. Placement subsystem (100) then communicates with drawing subsystem (104) over communication link (112) to instruct drawing subsystem (104) where to draw each graphical object on the graphical output device (106) over communication link (114) to create the desired graphical image (claims 1.a., 7.b.i., 13.a., 19-21). The resulting graphical image constructed by graphical output device (106) shows the graphical objects placed on the graphical image according to the user defined rules manipulated by placement subsystem (100) [column 5, lines 1-8]. As shown in Fig. 2, these subsystems (100) (102) (104) may coexist on a common computer system (210) (claims 7, 20: a computer having memory) [column 5, line 14]. The rule-processing component (200) represents the rule application (claims 7.b.) means for automatically reading and applying the placement rules defined by the user of the rule definition means [column 5, lines 58-61]. Graphical objects may be lines, symbols, geometric shapes, text, or other constructs which are to be placed on the graphical image (claims 1.b., 7.b.ii., 13.b.) [column 1, lines 24-26].

Applicants traverse the above rejections for one or more of the following reasons:

(1) Hollingsworth, Matsushita, and Felser do not teach, disclose or suggest defining a location property, without moving an object, wherein the object is part of a drawing that has been obtained;

(2) Hollingsworth, Matsushita, and Felser do not teach, disclose or suggest a location property that provides a location within a drawing for an object with respect to another object, area, or space; and

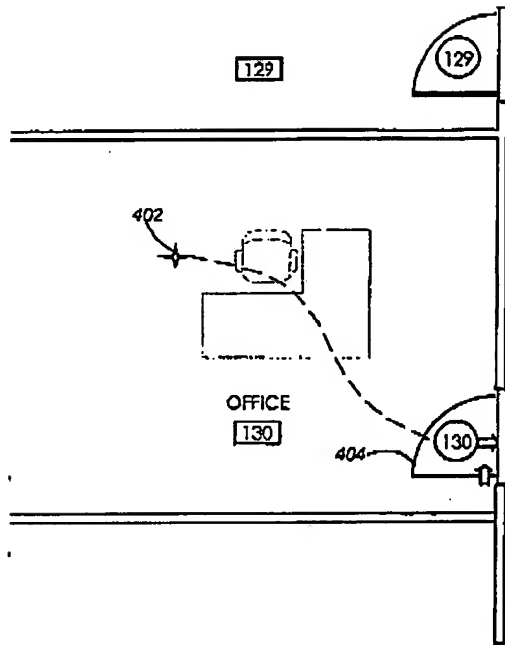
(3) Hollingsworth fails to teach, disclose or suggest a value for a property of one or more objects from another object area or space that is based on the location of the object (i.e., as specified in the automatic location property).

Independent claims 1, 7, and 13 are generally directed to determining/specifying a location for an object within a drawing. Specifically, a drawing (in a drawing program) is obtained. The drawing has two or more existing object that each comprise a collection of graphical elements. One of the existing objects in the drawing is identified and an automatic location property is defined for the identified object. The claims explicitly provide and define the automatic location property. First, the automatic location property is defined without moving the identified already existing object. Secondly, the automatic location property provides a location, within the drawing, for the identified object with respect to another object, area, or space. Additionally, a value for a property of the identified object is obtained from property data of the other object, area, or space where and based on the location of the identified object. Accordingly, a location property for an object provides a location for the object wherein the location value is based on data from another object, area, or space that the object is associated with.

Applicants submit that there is a clear differentiation between the term "location" as used in the claims and the specification verses that used in Hollingsworth as cited in the Office Action. Applicants have attempted to further include such a definition of the term "location" in the amended claims. Namely, the "location" is not the actual physical location of the object or how to place the object (via a set of rules) as in Hollingsworth. Instead, the "location" is an actual specified identified location for the object that is defined without moving or placing the object. In other words, as used in the dependent claims, the "location" may be established merely by moving the location grip which does not move the object itself. Instead, the "location" of the object is merely identified as on or within another object, area, or space.

Applicants direct the attention of the Patent Office to FIG. 4:

FIG. 4



In FIG. 4, the object is identified as object 404. However, the location of the object is at location grip 402. Thus, the "location" of door object 404 is not set when the door is placed in the drawing, but after the door has been placed in the drawing (i.e., an existing drawing is obtained), the location 402 may be defined without moving the door object 404 itself.

Such claim language and limitations are clearly distinguishable from that of Hollingsworth wherein the Patent Office has equated the location property with the actual location and placement of the object itself. The Office Action submits that the placement rules establish the other objects and the values of the property of the identified object with respect to another object, area, or space. However, as amended, the present claims cannot and do not read on Hollingsworth. Firstly, a drawing having existing objects is obtained. In other words, objects are not being placed into the drawing. In addition, one of the existing objects is identified and an automatic location property for the identified existing object is defined without moving the object. Such a defining of a "location"

without moving the object itself and for a object that already exists in a drawing clearly differentiates the present invention from Hollingsworth.

Again the present invention is not directed towards placing an object in a drawing or placement rules. Instead, the location property reflects an entirely different concept from that of placement rules. In this regard, Applicant is entitled to be its own lexicographer and the specification must be relied upon to determine the definition of a particular term. The Office Action is attempting to equate the claimed term "location" with a location as used in Hollingsworth that is wholly inconsistent with the defined use in the present specification. Accordingly, Applicants submit that the interpretation of the claims and Hollingsworth is improper.

In addition to the above, the claim attributes provide the unique ability to define the location of the object within a drawing based on other/nearby objects, areas, or spaces. The dependent claims set forth further details regarding the location. Further, the dependent claims provide additional limitations that reflect the location based attributes of the location property. For example, dependent claims 19-21 provide for automatically retrieving data for the one or more objects from the other object, area, or space where the one or more objects are located. In other words, when the location property provides that the one or more objects reside with or are associated with a particular object, area, or space, data for the one or more objects are automatically retrieved from the particular object, area, or space it is associated with (i.e., where it is located).

In addition, dependent claims 5-6, 11-12, and 17-18 provide for the use of a location grip in determining the location of the object. In this regard, a location grip is displayed in a drawing and the position of the location grip within the drawing determines the location of the object. Further, the location grip and thereby the "location" of the object may be moved without moving the object itself. Such a feature again establishes clear nonobvious differences from the placement of objects described in Hollingsworth.

The Office Action rejects dependent claims 4, 10, and 16 based on Hollingsworth and Matsushita. Applicants submit that such rejections are without merit. Nowhere in Matsushita is there any description of a determination of an automatic door number. In this regard, electronic searches of Matsushita for the terms "automatic" or "door number" provide no results whatsoever. Without even mentioning the term "automatic", Matsushita cannot possibly teach the automatic determination of a door number as claimed. The obviousness determination specified in the Office Action provides that the automatic placement reduced the burden on the user of manually applying complex drafting rules in creating or modifying graphical images. These dependent claims address

the use of a door number that is automatically determined and not the automatic placement of a door. Further, the door number is based on a space where the door is located. No such construct or teaching is even remotely alluded to in either Matsushita or Hollingsworth.

In response to such earlier arguments, the final office Action submits that a figure may be placed at a desired position with a desired shape and the figure maybe a door as shown in Figs. 7, 8, 9, and 10 of Matsushita. However, while a door may be described in Matsushita, the claims do not merely recite the use of a door. Instead, the claims explicitly refer to the an automatic door number for the door based on a space the door is located in or near. Again, there is no door number, automatic door number, nor the automatic determination of a particular door number even remotely described in Matsushita. Further, Applicants submit that it would not be obvious to automatically label the doors via Hollingsworth's user-defined rules. In this regard, Hollingsworth also fails to even remotely describe an automatic door number or the determination of such a door number as explicitly claimed.

Dependent claims 5, 6, 11, 12, 17, and 18 address a location grip that is displayed in the drawing and used to determine the location of the object. Further, the grip location determines where the value for the property of the object is obtained from. The Office Action rejects these claims based on Hollingsworth and Felser. However, both Hollingsworth and Felser completely lack any discussion, implicit or explicit of a grip. In fact, electronic searches of both Hollingsworth and Feler for the term "grip" provides no results whatsoever. Without even mentioning the word "grip", these references cannot possibly teach the specific use of a grip to determine a location of an object with respect to another object/area/space. The Office Action attempts to use Felser's handles and resizing to equate to the grips as claimed. However, handles and resizing directly manipulate the actual object and are not merely used as a location grip to specify a location for the object with respect to other objects/areas/spaces that is then used to determine a property value (as claimed).

In response to the above prior arguments, the final Office Action refers to Felser's handles that allow the direct manipulation of the shape object thereby allowing a user to stretch or otherwise resize the shape object. While such a handle for resizing an object is clearly useful, it is irrelevant with respect to the present claims. The grips of the presently claimed invention identify a "location" for the object and are not used to resize or place the object. In fact, the claims provide that the location of the object may be moved by moving the location grip without moving the object itself. Such a limitation is clearly distinguishable from that of both Hollingsworth and Felser. Applicants

further disagree and traverse the assertion that Felser's graphical objects are the claimed grips. Again, the presently claimed grips are not used to place an object. Instead, they merely identify a "location" of the object without moving the object itself. Such a limitation is not even remotely similar to that of Felser or Hollingsworth.

In view of the above, Applicants submit that the various elements of Applicants' claimed invention together provide operational advantages over the systems disclosed in Hollingsworth, Matsushita, and Felser. In addition, Applicants' invention solves problems not recognized by Hollingsworth, Matsushita, and Felser.

Thus, Applicants submit that independent claims 1, 7, and 13 are allowable over Hollingsworth, Matsushita, and Felser. Further, dependent claims 2-6, 8-12, and 14-21 are submitted to be allowable over Hollingsworth, Matsushita, and Felser in the same manner, because they are dependent on independent claims 1, 7, and 13, respectively, and because they contain all the limitations of the independent claims. In addition, dependent claims 2-6, 8-12, and 14-21 recite additional novel elements not shown by Hollingsworth, Matsushita, and Felser.

### III. ADVISORY ACTION

In response to the above amendments and arguments, the Advisory Action indicates that the amendment or requiring "two or more existing objects in a drawing program" is not supported in the specification. Applicants respectfully disagree and traverse such an assertion.

Applicants note that the test for sufficiency of written description support in a patent application is whether the disclosure of the application relied upon reasonably conveys to the artisan that the inventor had possession of the claimed subject matter. An "explicit" disclosure of claim terms is not required under 35 U.S.C. § 112, first paragraph. Put another way, an invention claimed need not be described *ipsis verbis* in the specification in order to satisfy the disclosure requirements.

Firstly, the original claims clearly support two or more existing objects. In this regard, the original claims initially provide for one or more objects in a drawing program. Thereafter, the automatic location property provides a location for the one or more objects with respect to another object, area or space. Accordingly, the prior independent claims clearly supported two or more objects: (1) the initial one or more objects, and (2) the "other" object (see independent claim 1).

In addition to the above, the background provides for a "number of doors" (see paragraph [0006]); such doors are objects and therefore two doors are in a drawing. In addition, the summary paragraph [0012] provides that an object obtains property values from property data on a polygonal

object near the object. Again, the entire detailed description is related to the use of at least two objects – one object that is identified, and a second object that provides a location for the identified object (see paragraphs [0021], [0029], [0035]-[0039], [0041], [0043]-[0045], the abstract, and FIG. 4). In view of the clear use and support of two or more objects in a drawing, Applicants submit that the amendments to the claims are supported by the specification as filed.

#### IV. CONCLUSION

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

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By their attorneys,

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